# ARCHAEOLOGY/CULTURAL LANDSCAPES/ETHNOGRAPHIC RESOURCES/HISTORIC STRUCTURES

Most of the comments received came from Native Americans. 16,501 comments. predominant theme of these comments was that the DEIS failed to recognize the important ties between the bison and Native Americans. Comments stated that bison are a cultural, spiritual, and religious resource to tribes, but that no analysis of impacts to these values was presented. A major theme in the comments was that the NPS has a Federal Trust responsibility to the tribes to protect and manage bison as a cultural resource for the tribe, and that the NPS has failed to do this. One comment indicated that the "taking" of bison was a significant impact on cultural resources. Comments stated that the discussion of cultural resources must include information on tribal social institutions, economic structure, and subsistence. Comments indicated that consultation was not conducted in accordance with three Executive Orders, i.e, "Government to Government Relations with Native American Tribal Governments", "Indian Sacred Sites", or " Consultation and Coordination with Indian Tribal Governments", and that there was not full compliance with the American Indian Religious Freedom Act or the National Historic Preservation Act. A comment indicated the bison is eligible for inclusion in the National Register of Historic Places and, as a result of that eligibility, it is alleged both the NPS and State of Montana have violated the National Historic Preservation Act. Related comments can be found in SOCIOECONOMICS -Social Values and CONSULTATION AND COORDINATION.

#### Comment 1

"The draft EIS is flawed because it fails to recognize or coordinate with Native Americans and their relationship with buffalo." Individual, Roseland, FL, YELL-10318.

#### Comment 2

"I am a member of the Northern Cheyenne Tribe of Montana and believe these animals have sacred significance to many Native Americans and ought not to be the victims of political wars." - Individual, Lame Deer, MT, YELL-10618.

## **Comment 3**

"Bison are an integral part of our environment and of the American Indian culture. The cattle, however, are very important to ranchers and the economy. There has to be a plan in which we can protect cattle from brucellosis, while keeping the bison out of 'killing range'." - Individual, Missoula, MT, YELL-11021.

#### **Comment 4**

"These impacts are not just economic. The loss of agricultural enterprises (ranching) to the affected counties, and the loss of open spaces and the habitat these lands provide to numerous wildlife species are vital to a healthy community. In addition, agriculture, especially animal agriculture and the lifestyle it provides is a cultural asset to the impacted counties and the state of Montana. If the ranching lifestyle is lost or severely changed, the culture of the area will be significantly altered. While the DEIS discusses at great lengths the bison as a cultural symbol, it fails to reach a balance [with] importance of agriculture to the culture of the area." - Public Agency - State of Idaho/Governor, YELL-11121.

#### **Comment 5**

"Preferred Alternative Burden of Implementation. The DEIS minimizes impacts of the preferred alternative implementation to Tribes and maximizes impacts to cattle producers while placing the burden of the implementation on the Tribes and tourists and protecting the cattle producers and snowmobile enthusiasts. The language in the SEIS [sic] describing impacts to Tribes should address this imbalance." - Tribe - Nez Perce Tribe, YELL-11409a.

### **Comment 6**

"The cultural resources section is very general, and the assessment of impacts is even more so. The DEIS fails to recognize the entire Yellowstone National Park and surrounding public lands as a cultural resource. Visual resources - scenic values - are an important component of Yellowstone Park and surrounding areas, and therefore have cultural values. Thus, any impact on the visual or scenic character is an impact on the nationally recognized cultural resource of the Yellowstone Park System." - Individual, Portland, OR, YELL-11416.

### **Comment 7**

"...Bison are considered by many tribes as a cultural resource...The use of lethal measures to cull Yellowstone bison qualifies as a significant environmental impact in this context (as it relates to Tribal cultural resource) as described under 40 CFR 1508.27(b)(5) and (8): 'The degree to which the possible effects on humans [are] highly uncertain or involve unique or unknown risks.' and 'The degree to which the action may adversely affect districts, sites, highways, structures, or objects... or may cause loss or destruction of significant scientific, cultural, or historical resources'." -Public Agency - Environmental Protection Agency, YELL-14356.